


UNITED STATES OF AMERICA : Hon. Mark Falk  
 :  
 v. : Mag. No. 13-3612  
 :  
 CHRISTOPHER J. BROCK : COMPLAINT

  
Signature of Judicial Officer

ATTACHMENT A

From in or about August 14, 2006 through in or about January 30, 2013, in the District of New Jersey and elsewhere, defendant

CHRISTOPHER J. BROCK

having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme or artifice.

In violation of Title 18, United States Code, Section 1343.

## ATTACHMENT B

I, Jason Carley, have been a Special Agent of the Federal Bureau of Investigation for approximately five years, and I have been personally involved in the investigation of this matter. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information relating to CHRISTOPHER J. BROCK, the defendant; and (c) my review of business records, bank records and other documents. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

### Introduction

1. As more fully described below, defendant CHRISTOPHER J. BROCK executed a scheme to defraud his former employer, John Wiley & Sons ("Wiley"), out of more than 2.8 million dollars' worth of textbooks.

### Background

2. At all times relevant to this Complaint, Wiley was based in Hoboken, New Jersey and was one of the largest publishers of technical writing in the world, with an estimated market value of approximately \$3 billion. A portion of Wiley's publications are collegiate textbooks, which are distributed to schools and universities that accept them into their curricula. Co-existing with Wiley's retailers are resellers of used or unwanted books that buy and sell directly to students.

3. At all times relevant to this Complaint, defendant BROCK resided in Oklahoma and was employed by Wiley, first as a Higher Education Publishing Representative, and most recently as a District Sales Supervisor based in Oklahoma.

### The Conspiracy

4. In furtherance of the conspiracy, defendant BROCK accessed the corporate systems of Wiley — including computers located in New Jersey — and diverted to himself more than approximately 16,000 textbooks and other items he fraudulently designated as free educational samples.

5. To avoid detection in a review of his employee records within the internal order system, defendant BROCK designated both actual and fabricated professors as the purported recipients of the items, and then defendant BROCK listed his own home address and other addresses that he controlled as alternate shipping addresses for those professors and directed that the books be shipped to those alternate addresses. This made it appear in the records of Wiley

that the free education samples were legitimately going to professors when, in reality, they were being sent to defendant BROCK.

6. Once defendant BROCK received the diverted textbooks he then sold them to resellers and received payment through PayPal accounts that he controlled. PayPal, in turn, would deposit the funds into bank accounts that defendant BROCK controlled, consistent with defendant BROCK's PayPal account settings.

7. Defendant BROCK sent, or caused to be sent, numerous interstate wires in furtherance of the scheme. For example, on or about August 20, 2012, defendant BROCK accessed Wiley's computer network remotely, ordered several hundred textbooks through multiple invoices that were purportedly free educational samples intended for local colleges or universities, and directed them to an alternate shipping address that was defendant BROCK's residence. These fraudulent orders were then processed electronically by Wiley's computer servers in Somerset, New Jersey. Defendant BROCK then sold a portion of these books to an online reseller on or about September 16, 2012. After receiving the shipments via FedEx on or about September 20, 2012, the online reseller then accessed PayPal on or about October 8, 2012 from a computer in Salem, Oregon to transmit payment to defendant BROCK.

8. In total, as a result of the scheme, defendant BROCK caused an approximate loss to Wiley of more than \$2.8 million. The money that defendant BROCK earned as a result of the scheme was largely used for personal expenditures, including, among other things, high-end home furnishings and scuba diving equipment.